

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In Re:

BEVERLY JANE CARY

Debtor

BEVERLY JANE CARY,

Plaintiff,

v.

PATCH SERVICES, LLC d/b/a NOAH;  
PATCH HOMES, INC.; FIRST AMERICAN  
TITLE INSURANCE COMPANY LENDERS  
ADVANTAGE,

Defendants.

Dist. Court Case No. \_\_\_\_\_

Case No. 20-12450 TWD

Adversary Case No. 22-01000-TWD

**STIPULATION OF THE PARTIES  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR WITHDRAWAL OF  
REFERENCE  
[LBR 5011-1]**

The Parties, by and through their undersigned counsel, hereby stipulate and agree  
as follows:

1. Plaintiff's Second Amended Complaint primarily involves noncore claims.
2. That resolution of Plaintiff's claims will require consideration of non-  
bankruptcy federal law which regulate organizations and activities affecting  
interstate commerce – namely the Truth in Lending Act ("TILA"), 15 U.S.C.

100047/002553/02629290-2

STIPULATION IN SUPPORT OF  
DEFENDANTS' MOTION TO  
WITHDRAW THE REFERENCE -1

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SEATTLE, WA 98101

1           §1601 *et seq.*

2           3. Plaintiff has demanded a jury trial and does not consent to such a trial being  
3           conducted by the bankruptcy court.

4           4. The case is in its infancy and no party will be prejudiced if the District Court  
5           withdraws the reference of this matter to the Bankruptcy Court.

6           5. Judicial economy and efficiency will be served if the reference is withdrawn  
7           and this matter transferred to District Court.

8           Wherefore, the Parties agree the reference to the Bankruptcy Court should be  
9           withdrawn and the matter transferred to the United States District Court for the Western  
10          District of Washington forthwith for further proceedings.

11          Wherefore, the Parties further agree that Defendants' deadline to respond to  
12          Plaintiff's adversary complaint is extended by two weeks.

13  
14          IT IS SO STIPULATED:

15          DATED: April 15, 2022

16          **LAGERLOF LLP**

17          /s/ Robert A. Bailey

18          Robert A. Bailey, WSBA No. 28472

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STIPULATION IN SUPPORT OF

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